



# Healthy Families Kick Off Meeting

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Government Team  
Licensing Division  
Department of Managed Health Care  
November 6, 2008



# Division of Licensing -- Gov't Team

The Government Team consists of:

- Kathleen McKnight, Senior Counsel
- Mike Punja, Counsel (LA)
- Lily Donn, Counsel
- Melissa Moon, Counsel (LA)
- Bill Prather, Associate Health Program Advisor
- Kelly Gaspar, Associate Health Program Advisor



# Topics covered today

- EOC Filing Tips
- Confidentiality
- Service Area Expansions



# EOC Filing Tips



# Exhibit E-1

## Your Road Map for DMHC

- Describe each change, and the page #
- Describe the reason for each change.
- If a change is required by MRMIB, cite the authority for that requirement (e.g. Letter dated 11/10/07, contract section, changes to model language, etc.)
- If revising an EOC based upon one previously approved, given the filing number and date approved.
- Explanations (including authority cites) for any deviations from KKA requirements.



# Lead Time

- DMHC will have 30 Calendar days to review and issue comments.
- Typical time to approval is about 45 days.
- We get MANY expedite requests.



# Redlining

- Please “redline” all changes-underline new text, and strikeout deleted text.
- Also, update any sections Department has asked the Plan to change in other EOC’s. If we have asked for revisions in one product line, please revise it similarly in this product line – otherwise time is wasted on both sides.



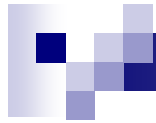
# What will speed review?

- Clear E-1, explaining what changes were made, WHY, and citing to authority.
- Consistency with Knox-Keene requirements.
- Explanations (including authority cites) for any deviations from KKA requirements.
- Accurate Redlining.
- Proofreading before filing.





# Confidentiality



# Confidentiality

- Rule 1007
- See E-Filing for Confidentiality Check List
- See E-filing Confidentiality Form (Form is not mandatory, content is)



# Confidentiality Flubs

- Confidential document filed in Request for Confidentiality
- Uploaded confidential document in exhibit not locked and not captioned as “Confidential” Exhibit
- request for confidentiality included in Exhibit E
- Uploaded confidential information in public exhibit which was next document uploaded after confidential exhibit



# Confidentiality Flubs -- continued

- Blank pages filed in confidential document
- Two plans on same transaction with different Requests (document and time) for same documents
- Fail to identify Exhibit name and letter and subject (e.g. multiple ASAs, contracts)
- No timeframe for confidentiality (start & end; rationale given for date)



# Confidentiality Flubs-- continued

- Request for obviously public documents
- No factual basis why information should be kept confidential, just conclusion or restatement of law
- E-filing questions: Siniva Pedro  
([spedro@dmhc.ca.gov](mailto:spedro@dmhc.ca.gov) or (916) 322-5393)



# Service Area Expansions: Filing Tips



# What triggers the need to file?

- Proposed addition of an entire county
- Proposed addition of zip codes within a county (regardless if Plan already is in county) – zip code splits inapplicable
- Introducing a new product line into a previously approved service area



# What kind of filing and when?

- Notice of Material Modification
- Department has 20 business days to review
- Often a Order of Postponement issued
- Bottom Line: File well ahead of start date





# What should I file in the MM?

- Service Area Expansion Checklist is a guide (on eFiling web portal)
- Main Exhibits: E-1, H, and I
- If 'carving out' services - networks and N
- Possible Exhibits: K, N, U, V, financial exhibits (check with assigned examiner)



# Helpful Hints

- Be sure to have a pre-filing conference
- Save time –use checklist and report
- Previously approved, unchanged documents (outside of provider rosters) often can be omitted – but need references
- Carve-outs – we need info
- Identify and address access issues
- Providers unwilling to contract – give report on attempts to contract